

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II  
290 BROADWAY  
NEW YORK, NEW YORK 10007-1866



DEC 19 2014

Thomas J. Ebbert  
Manager, Remediation  
PPG Industries, Inc.  
4325 Rosanna Drive  
Allison Park, PA 15101

Re: Riverside Industrial Park Superfund Site, Newark, New Jersey: Administrative Settlement Agreement and Order on Consent For Remedial Investigation and Feasibility Study - CERCLA Docket No. 02-2014-2011

Dear Mr. Ebbert:

The U.S. Environmental Protection Agency (EPA) has reviewed PPG Industries, Inc.'s (PPG) submittal entitled the "Site Characterization Summary Report, Riverside Industrial Park Superfund Site, Newark, New Jersey, July 8, 2014" (SCSR). Pursuant to Paragraph 41 of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation and Feasibility Study, attached are EPA's comments on the SCSR. EPA expects the requested modifications will be reflected in a revised SCSR to be submitted by PPG within 21 days.

We appreciate your cooperation and we look forward to continuing to work in this cooperative manner. If you have any questions, feel free to contact me at 212-637-4396.

Sincerely yours,

Elizabeth Butler  
Remedial Project Manager  
Emergency and Remedial Response Division

Enclosure

cc: A. Carpenter, EPA  
W. Reilly, EPA

**Comments on  
Site Characterization Summary Report (SCSR)  
July 2014**

General:

1. The Executive Summary and Introduction should clearly explain that the purpose of this document is to assist with the planning of the RI/FS Work Plan by evaluating the existing data, developing a preliminary CSM and identifying data gaps; and further it should clarify that it will be amended after collection of the RI data before it ultimately gets incorporated into the future RI Report after EPA approval.
2. In Sections 2.7, 4.1.1, 6.1.1 and elsewhere throughout the document where statements are made about DEP's designation of the Site as a "historic fill area" or where conclusions are made about the status of soil or groundwater as it relates to "historic fill", it should be made clear whether DEP actually stated that in writing as part of the various Lot investigations or whether this was just determined from their *2004 Historic Fill Map*. Additionally, any previous DEP designations need to be confirmed with DEP and, therefore, should be considered a data gap as we move forward with the RI work planning process.
3. In Section 4.4 and elsewhere throughout the document it is assumed that the previously collected data is "acceptable for the purpose of this report", but no information was provided regarding the QA/QC or type of evaluation performed of the data to make that assumption. It appears some existing data had more information than others, therefore, there may be limitations to the acceptability of the data pending its use. Although it is EPA's intention to make use of the existing data to the extent practicable, the quality of the data will determine whether it can be used for site characterization, risk assessment, enforcement or none of the above. In general, if DEP has accepted the data for site characterization purposes, EPA intends to do the same, but further evaluation will be necessary to determine if it is of sufficient quality for other purposes. Please provide additional information as to how the acceptability determination was made. In addition, summary tables of the data including the number of samples, sample depths, limits, etc. would be useful in determining what additional data needs to be collected.
4. This document identifies a number of chemicals for which there is a lack of toxicity information as well as chemicals that may require special analytical techniques. This needs to be considered during future evaluations and in development of the RI/FS Work plan.
5. Since a number of institutional/engineering controls have already been put in place on the various Lots comprising the Site, it would be helpful to put together a map showing all of the areas with deed restrictions and engineering controls and a second map showing all of the areas covered by CEAs. These remedial actions will need to be evaluated as we look at all 15 Lots as one Site in light of the future use determinations for the Site.
6. Due to the varying uses of this Site, a major consideration moving forward will be the determination of the anticipated future land use. In development of the RI/FS

Work Plan, information should be obtained from the various Lot owners regarding any current or future plans for those Lots.

Specific:

1. Section 1.1, p. 1-1 – Delete “Focused” from “Focused Feasibility Study”.
2. Section 3.8.1, p 3-8 – EPA does not agree with the last couple of sentences in this section characterizing the quality of the data. To clarify, EPA previously stated in a June 17, 2014 email to PPG that EPA has reason to question analytical laboratory result data for samples taken at the Riverside Avenue Site. The email further stated that EPA is not able to say that these data are of known quality and the samples in question were provided by EPA to PPG in an attachment to the June 17, 2014 email. Also in that email, EPA requested that PPG not use the data in its SCSR for the Site. EPA’s position on this remains the same today as it did on June 17, 2014, therefore, please revise those last 2 sentences as follows: “The results of the investigation were reviewed; however, USEPA requested that PPG not use this data in its Site Characterization Summary Report for the Site because USEPA is not able to say that these data are of known quality.” This clarification should be made in any other places in the document where the data from the June 17, 2014 email are discussed as well.
3. Section 4.3, p. 4-4 – In the first paragraph, the statement about the flow of the Passaic River should be corrected to indicate that the river is tidal in the area of the Site.
4. Section 4.4, p. 4-5 – The screening analysis relies on the Industrial Regional Screening Levels as a basis of comparison but does not indicate the level used. Typically for an initial screening the risk assessment relies on residential screening levels at a risk level of 10<sup>-6</sup> and an HI = 0.1 to assure that chemicals are not prematurely removed from consideration.
5. Section 4.4.2, p. 4-7 – What is DEP’s classification of groundwater in the area?
6. Section 4.4.2, p. 4-8 – In the 2<sup>nd</sup> para, the sentence that starts with “Some of these effects...” seems to be incomplete.
7. Section 5.4, p. 5-2 – The current potential receptors should be identified in addition to the potential receptor pathways. These two items will need to be updated once the future land use is determined. Risk assessments are based on current and future land use. Completion of the Risk Assessment Guidance for Superfund Part D Table 1 would be helpful with this task.
8. Section 6.6, p 6-7 – Insert “Gas” after “Soil” in the last bullet.
9. Section 6.7, p 6-7 – Delete the sentence about the Passaic River immediately following the bullets.
10. Table 3 – Add “Human Health Risk” as a Data Gap with “Determine future land use and potential receptors” as the Tasks To Address Data Gaps.
11. Table 3 – Under Tasks for the Surface Soil and Source Definition Data Gap, add “Confirm “historic fill” designation”.